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*Attorneys for Defendants Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB146013, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500612, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500642, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500626, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500618 via Syndicates 1886 and 1861, Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500629, and Chubb Insurance Company of Canada*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC.; VALEANT  
PHARMACEUTICALS INTERNATIONAL; and  
AGMS, INC.,

Plaintiffs,

v.

AIG INSURANCE COMPANY OF CANADA;  
ACE INA INSURANCE COMPANY; ALLIANZ

Civil Action No.: 3:18-cv-00493

Hon. Michael Shipp

**NOTICE OF  
MOTION OF CERTAIN  
DEFENDANTS TO STRIKE  
ERRONEOUSLY FILED  
DOCUMENTS NOS. 15 & 16**

GLOBAL RISKS US INSURANCE COMPANY;  
ARCH INSURANCE CANADA LTD; EVEREST  
INSURANCE COMPANY OF CANADA;  
HARTFORD FIRE INSURANCE COMPANY;  
IRONSHORE CANADA LTD.; LIBERTY  
INTERNATIONAL UNDERWRITERS, a division  
of LIBERTY MUTUAL INSURANCE  
COMPANY; LIBERTY MUTUAL  
INSURANCE COMPANY; LLOYD'S  
UNDERWRITERS; LLOYD'S CONSORTIUM  
9885 (a/k/a STARR FINANCIAL LINES  
CONSORTIUM 9885); LLOYD'S SYNDICATE  
ANV 1861; LLOYD'S SYNDICATE AMA 1200;  
LLOYD'S SYNDICATE ARGO 1200; LLOYD'S  
SYNDICATE AWH 2232; LLOYD'S  
SYNDICATE BRT 2987; LLOYD'S SYNDICATE  
CVS 1919; LLOYD'S SYNDICATE HCC 4141;  
LLOYD'S SYNDICATE MITSUI 3210;  
LLOYD'S SYNDICATE MIT 3210; LLOYD'S  
SYNDICATE NAV 1221; LLOYD'S  
SYNDICATE QBE 1886; LLOYD'S  
SYNDICATE SJC 2003; ROYAL & SUN  
ALLIANCE INSURANCE COMPANY OF  
CANADA; TEMPLE INSURANCE COMPANY;  
and XL INSURANCE COMPANY SE,

Defendants.

PLEASE TAKE NOTICE that Defendants Liberty International Underwriters, a division of Liberty Mutual Insurance Company, Liberty Mutual Insurance Company, Royal & Sun Alliance Insurance Company of Canada, Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078613, incorrectly named as "Lloyd's Syndicate CVS 1919," Certain Underwriters at Lloyd's, London subscribing to Policy No. QB078913, incorrectly named as "Lloyd's Syndicate QBE 1886" and "Lloyd's Syndicate ANV 1861," Certain Underwriters at Lloyd's, London subscribing to Policy No. QB146013, incorrectly named as "Lloyd's Syndicate Mitsui 3210," Certain Underwriters at Lloyd's, London subscribing to Policy No. B0509FINMW1500612, incorrectly named as "Lloyd's Consortium 9885 (a/k/a Starr Financial Lines Consortium 9885)"

and “Lloyd’s Syndicate QBE 1886,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500642, incorrectly named as “Lloyd’s Syndicate Argo 1200,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500626, incorrectly named as “Lloyd’s Syndicate MIT 3210,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500618 via Syndicates 1886 and 1861, incorrectly named as “Lloyd’s Syndicate QBE 1886” and “Lloyd’s Syndicate ANV 1861,” Certain Underwriters at Lloyd’s, London subscribing to Policy No. B0509FINMW1500629, incorrectly named as “Lloyd’s Syndicate MIT 3210” and “Lloyd’s Syndicate AMA 1200,” and Chubb Insurance Company of Canada, formerly known as ACE INA Insurance Company (collectively herein “Moving Defendants”), by and through their attorneys, MARKS, O’NEILL, O’BRIEN, DOHERTY & KELLY, P.C. and WILFORD CONRAD LLP, hereby move before this Honorable Court for an Order striking Documents Nos. 15 and 16 from the docket.

Moving Defendants hereby rely upon the Certification of Counsel attached and submitted herewith in support of this Motion.

Dated: January 22, 2018

Respectfully submitted,

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and

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